

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

BRAVERMAN KASKEY GARBER PC  
DAVID L. BRAVERMAN, ESQ.  
ISABELLA H. GRAY, ESQ.

One Liberty Place

1650 Market St.

56th Fl.

Philadelphia, PA 19103

(215)-575-3800

(215)-575-3801

braver@braverlaw.com

gray@braverlaw.com

*Attorneys for Landlord CITTA Enterprises Co, LLC*

In Re:

RITE AID CORPORATION, et al.

Case No. 23-18993-MBK

Judge: MICHAEL B. KAPLAN

Chapter 11

(Jointly Administered)

**NOTICE OF MOTION OF CITTA ENTERPRISES CO, LLC TO SET  
DEADLINE TO ACCEPT OR REJECT LEASE PURSUANT TO 11 U.S.C. § 365(D)(2)**

**TO: ALL INTERESTED PARTIES**

**PLEASE TAKE NOTICE** that on January 18, 2024 at 10:00 AM (EST), or as soon thereafter as counsel may be heard, the undersigned attorney for CITTA Enterprises Co, LLC (“Citta”) shall move for entry of an order pursuant to 11 U.S.C. § 365(d)(2) setting the deadline for Rite Aid Corporation to accept or reject its lease with Citta to January 31, 2024 (the “Motion”) before the Honorable Michael B. Kaplan via Zoom.

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely on the Motion setting for the factual and legal basis for granting the requested relief. No memorandum of law is necessary given the straightforward factual background and basis for granting the requested relief.

**PLEASE TAKE FURTHER NOTICE** that any objections to the relief requested by the Motion submitted herewith shall be in writing, setting forth with particularity the bases for the objections, and filed with the Clerk of the United States Bankruptcy Court by electronic means by attorneys authorized to do so pursuant to the Bankruptcy Court's General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents, the Administrative Procedures for Filing, Signing, and Verifying Documents by Electronic Means, and Commentary Supplementing Administrative Procedures, and by all other parties-in-interest, in searchable Portable Document Format (PDF), and served in accordance with the Bankruptcy Court's Local Rules and the procedures set forth in the documents referenced above so as to be served to the undersigned by no later than seven (7) days before the hearing date of the subject Motion, set forth above.

**PLEASE TAKE FURTHER NOTICE** that a proposed order granting the relief sought by the Motion is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that the Motion shall be deemed uncontested if objections are not timely submitted pursuant to L.B.R. 9013-1(a), and the requested relief may be granted without a hearing.

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests oral argument on the date of the Motion hearing if objections are timely submitted.

Respectfully submitted,

**BRAVERMAN KASKEY GARBER PC**

Dated: January 10, 2024

BY: /s/ Isabella H. Gray  
DAVID L. BRAVERMAN, ESQ.  
ISABELLA H. GRAY, ESQ.  
1650 Market Street, 56th Floor  
Philadelphia, PA 19103  
Telephone: (215) 575-3800

Facsimile: (215) 575-3801

*Attorneys for CITTA Enterprises Co, LLC*